IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

FRANCISCO MEJIA,)
Plaintiff,)
v.) C.A. No. 18-296-RGA
BIG LEAGUE ADVANCE FUND I, L.P.,)
Defendant.)

STIPULATION AND PROPOSED ORDER OF DISMISSAL WITH PREJUDICE

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff Francisco Mejia ("Mejia") and Defendant Big League Advance Fund I, L.P. ("BLA"), do hereby stipulate and agree that all claims and counterclaims in this action are dismissed with prejudice. With the exception of the portion of BLA's attorneys' fees Mejia has agreed to pay BLA to resolve its counterclaims against Mejia, each party shall bear its own costs, expenses, and attorneys' fees.

Of Counsel:

Anthony G. Buzbee
Texas Bar No. 24001820
tbuzbee@txattorneys.com
Peter K. Taaffe
Texas Bar No. 24003029
ptaaffe@txattorneys.com
Crystal Del Toro
cdeltoro@txattorneys.com
Texas Bar No. 24090070
THE BUZBEE LAW FIRM
JP Morgan Chase Tower
600 Travis, Suite 7300
Houston, Texas 77002

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Pilar G. Kraman

Richard A. DiLiberto, Jr. (#2429)
Martin S. Lessner (#3109)
Pilar G. Kraman (#5199)
Rodney Square
1000 North King Street
Wilmington, DE 19801
(302) 571-6600
rdiliberto@ycst.com
mlessner@ycst.com
pkraman@ycst.com

Attorneys for Plaintiff for the limited and exclusive purpose of filing this Stipulation and Proposed Order.

Of Counsel:

Marc Zwillinger
Jeffrey Landis
Nury Siekkinen
ZWILLGEN PLLC
1900 M St. NW, Ste. 250
Washington, DC 20036
(202) 706-5203
marc@zwillgen.com
jeff@zwillgen.com
nury@zwillgen.com

ASHBY & GEDDES

/s/ Tiffany Geyer Lydon
Philip Trainer, Jr. (#2788)
Tiffany Geyer Lydon (#3950)
500 Delaware Avenue, 8th Floor
P.O. Box 1150
Wilmington, DE 19899
(302) 654-1888
ptrainer@ashby-geddes.com
tlydon@ashby-geddes.com

nited States District Court Judge

Attorneys for Defendant

Dated: August 31, 2018

Dated: <u>August 31</u>, 2018

SO ORDERED: